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ABSTRACT

The historical foundations of postsecondary institutional accreditation are traced, and the relationships between the federal and state governments and accrediting associations are analyzed within the context of environmental change. The following emerging characteristics of institutional accreditation are considered: strong traditions of voluntary self-regulation, dependence on evaluation, the expansion in the numbers of accrediting agencies and the resulting fragmentation of the accreditation process, and the leadership role assumed by the Council on Postsecondary Education in restructuring the accreditation community. Recent federal initiatives emphasizing regulatory reform and disengagement, which has moved responsibility for education to the states, has significant policy implications. Policy and environmental changes can lead to the creation of new accreditation structures, role redefinitions, and new relationships among government sectors and accrediting agencies. It is suggested that recognizing these environmental shifts and taking the initiative to formulate policies that facilitate rather than suppress organizational change can contribute to the emergence of an effective postsecondary accreditation mechanism. Appropriate and inappropriate uses of accreditation are also discussed, along with future directions. (SW)

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Environmental Change and Regulatory Reform in Postsecondary Institutional Accreditation

August 1985

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Abstract

A critical review of the historical foundations of postsecondary institutional accreditation and an analysis of the relationships between the federal and state governments and accrediting associations, the "Triad," within the context of a changing policy environment is the focus of this study. Recent federal initiatives emphasizing regulatory reform and disengagement, moving responsibility for education to the states, has significant policy implications. Changes in the environment and a dramatic shift in federal policy have created an opportunity rather than a crisis in accreditation that can contribute to redefining roles, creating new accreditation structures, and developing new relationships among members of the "Triad." This paper suggests that past environmental shifts contributed to the emergence of a strong institutional accreditation system in the nation and that recent environmental shifts in policy directions can continue to contribute to that process. These emerging mechanisms in postsecondary accreditation will, in all probability, operate in an environment of limited federal regulatory control, enhanced state capabilities, and refined association responsibilities.

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PREFACE

The intent of this paper is to review the history and analyze the dynamic relationships between the federal and state governments and accrediting associations within the context of environmental change. These relationships over the past 70 years have been developed and modified by powerful historical and environmental forces. Understanding the manner in which external environmental change impacts the structure and relationships among organizations is of crucial importance to those who formulate policies and direct the affairs of government and institutions.

The convergence of environmental pressures during the past decade have created an opportunity rather than a crisis in American postsecondary education. A chance has been presented to redefine roles, recreate organizational structures, and develop new relationships. Organizational survival requires adaptive as well as directive action in those strategic areas where the organization has discretion. When environments change, the organization must change the configuration of its structure to ensure continued viable interaction with other elements in its environment. This paper suggests that recognizing these environmental shifts and taking the initiative to formulate policies that facilitate rather than supress organizational change can contribute to the emergence of an effective accreditation mechanism in postsecondary education.

I. BACKGROUND

Accreditation emerged shortly after the turn of the century as an integral part of the growing progressive-professional movement in American education. It was a turbulent period as the nation made a dramatic transition from an agrarian to an industrial society. This transition stimulated economic, intellectual, and organizational changes (Allen, 1952) that influenced America's educational system (Hofstadter, 1955). Within this context of turmoil, uncertainty, and change, a number of national educational leaders saw opportunity in what appeared to be chaos. It was a chance for redefinition and improvement. In 1907, Woodrow Wilson, then president of Princeton University, observed that the nation was on "the eve of reconstruction...a period when we are going to set standards...a period of synthesis" (p. 89).

The environmental milieu (Mortimer and Tierney, 1979) in which accreditation emerged shaped its purposes and defined the limitations of the role it would play in American education (Seldon, 1977). Accreditation reflected society's conservative views and strong beliefs in individual initiative and voluntary collective action to bring about reform rather than relying on a strong central government to correct injustices (Butts, 1939; Young, 1983). These strongly-shared tenets, in combination with the decentralized nature of American education and

a changing environment, created a set of unique conditions in which change strategies were broadly supported.

During this formative period, the absence of common standards in secondary and postsecondary education that developed as a result of abuses provided the stimulation for the emergence of voluntary accreditation in the United States (Seldon, 1977). Early efforts directed toward professional, postsecondary standards emerged out of a 1904-1905 collaborative study of medical education conducted by the American Medical Association's (AMA) Council on Medical Education and the Carnegie Foundation (Wolotkiewicz, 1980). In 1906 and 1907, the medical profession established the first bona fide accrediting agency (Seldon, 1977). The Flexner report that followed in 1910 accelerated the expansion and acceptance of standards for accreditation of professional medical education programs. The American Bar Association began professional education accreditation efforts in 1913, shortly after the North Central Association published a list of accredited colleges. By the 1920's, the prestige of these professional groups and institutions that initiated these early efforts had contributed to the legitimacy and widespread acceptance and expansion of the practice of voluntary accreditation in secondary and postsecondary education.

Accreditation began as a relatively simple idea (Young, 1983) that was grounded in the widely accepted concept of voluntary self-regulation as the basis for establishing and maintaining predetermined educational

standards. These standards, voluntarily initiated within the educational community, defined schools, the articulation between secondary schools, colleges, and universities, and (in quantitative terms) the minimum membership requirements of institutions (Seldon, 1977; Young, 1983).

The initial purpose of accreditation was to establish commonly-accepted definitions and standards, protect the public, stimulate continued self-improvement, and protect the schools from improper internal and external pressures (Seldon, 1977). These standards were modified in 1929 by the higher education community to more closely reflect their unique characteristics. The revisions included greater consideration and acceptance of wide variations among institutional goals and programs and provided a broader basis or total pattern upon which an institution would be judged. These revisions protected the integrity and diversity of institutions subject to accreditation standards. Each institution would be judged, based on an in-depth self-study, in terms of the unique purpose(s) it intended to serve. In 1932, in the midst of considerable social and economic turbulence, an eight-year study was initiated to examine college admission standards. A shift in public attitudes, which supported improved access to postsecondary education by a broader spectrum of society, was reflected in a significant change from rigid quantitative criteria to include a more flexible qualitative assessment of a student's capabilities. During the pre-World War II era, six regional associations and several specialized professional

associations (Young, 1983) took the lead to refine their accreditation standards to more closely reflect the strong, shared beliefs of society and facilitate postsecondary institutions in adopting to shifts in their external environment.

During the post-World War II era, there was a growing belief that society, acting through a strong, proactive federal government, should improve economic and social mobility by increasing access to postsecondary education. The federal government provided the financial support to realize this social agenda through the Serviceman's Readjustment Act of 1944 (G.I. Bill). This act uniquely provided the financial support by which unprecedented numbers of nontraditional students could access postsecondary education, as well as the impetus for the federal government's use of private accreditation as an integral part of the eligibility determination process. The Veterans Readjustment Act of 1952 (P.L. 82-250) was an effort to correct some flagrant abuses, and focused on addressing the issues of educational standards for institutions seeking eligibility for students to receive federal assistance under the G.I. Bill.

The Veterans Readjustment Act formally assigned responsibility for the determination of eligibility to the U.S. Office of Education (OE). The fundamental relationships, with respect to accreditation, between federal legislation for education, OE, and the role of the private sector in the eligibility process was spelled out in the eligibility

language of this 1952 Act. Based on Section 523, the U.S. Commissioner of Education (later the Secretary of the U.S. Department of Education), is responsible for annually publishing a list of recognized accrediting agencies or associations on which (s)he relies. This list serves as an indicator of program or institutional quality. The Commissioner used lists of institutions accredited by private, voluntary accrediting agencies to fulfill the first of a two-part eligibility determination process.* The second part requires that the institution be chartered as a legal entity or licensed by the state in which it is operating or, in several instances, by the federal government itself. This two-stage process was initially viewed as an ideal approach through which the federal government could gain assurances of quality and soundness of institutions, as determined by private accrediting agencies and state governments, and stay out of the role of evaluating individual institutions for which it neither had the constitutional authority nor the capability to act in a regulatory capacity.

Although this process appeared to be straightforward, the variations in state licensing laws and the diversity of accrediting agencies that determined institutional and program standards created a unique and complex set of relationships between the federal government, state governments, and private accreditation agencies. In addition, the Commissioner's reliance on private-sector accreditation for eligibility of public-sector funds increased OE's importance and led to a dramatic

*Institutions can fulfill this requirement through an alternative mechanism.

proliferation of accrediting agencies that sought to meet the needs of their members and to endow their respective constituent institutions with both an aura of legitimacy (Handlin, 1970; Jenks and Reisman, 1977) and a vehicle through which they could gain access to a large "pot" of federal funds. The confluence of legislative events, the availability of federal funds, and the convenience of established private-sector accreditation mechanisms contributed to the confusion of the purposes of accreditation. The vested interests in the accreditation process and the agendas that emerged in this new environment created a complex situation.

The Higher Education Act of 1965 established within OE the Division of Eligibility and Institutional Accreditation. This unit was formally charged with the responsibility for systematically analyzing the organizational policies, structure, and operations of private accreditation agencies that were seeking initial or renewed recognition by the Commissioner (Seldon, 1977). The Division is guided in its determinations by an advisory board whose membership is composed of persons from accrediting agencies, the general public, and the postsecondary student population. The Division orchestrates the sensitive and complex relationships key to both the accreditation and eligibility processes. The Division, strategically placed on the boundaries of interlocking interest groups, is often thwarted in its efforts to both maintain the delicate balance protecting the integrity of federal assistance programs (without direct involvement in

education; i.e., in a regulatory role) and contributing to the viability of private-sector accreditation on which it increasingly relies.

The relationship between the federal government and accrediting associations is as important as it is unique. Funds are made available, in large part, without explicit constitutional authority for intervention in education and has placed the government in a dependency role relying on external authorities (accrediting agencies) for decisions about institutional quality.

The social and political environment of the mid- and late 1960's contributed to the legitimacy of the federal government in employing indirect pressure on accrediting agencies to more fully consider the consumer interests of the public in their accreditation reviews (Seldon, 1977). The accreditation associations were reluctant to serve these social engineering objectives (Kayson, 1979) and become the government's regulatory agent. They considered this an inappropriate incursion into their legitimate prerogatives. The federal government clearly attempted to recast existing private accreditation mechanisms to serve its expanding and inappropriate regulatory role in education. The government, not having an explicit constitutional prerogative in matters pertaining directly or indirectly to the control of education, attempted to shape the functions of private accrediting agencies. These activities were not only inappropriate, but also threatened to compromise their original and decidedly useful purpose--the improvement of educational quality.

The Education Amendments of 1972 exacerbated this situation further by including in its provisions a definition of "higher education" as "postsecondary education." It not only increased the number and diversity of institutions but also, in concert with the public mood toward education, laid the groundwork for both accountability and a stronger coordination role for states. Analysts observed this move as the nascent stages of developing a "triad" (Seldon, 1977) relationship between the federal government, state governments, and accrediting agencies. This potentially dynamic relationship was slow to emerge as each entity attempted to define its responsibilities and maneuver for a position that would best meet its respective interests. This assessment and definition effort was compromised by the federal government's overriding interest in converting the accreditation process to support its social engineering agenda. The resistance of the accreditation agencies to this new quasi-governmental role was not focused on the desirability or soundness of social policies as much as it was for their being an inappropriate vehicle for the regulatory enforcement of government policies that, in addition, carried with it the potential for destroying a viable and decidely useful private-sector mechanism.

An analysis of the aforementioned legislative action according to Finkin (1978) indicates several closely-related positions:

1. The statutes recognized that private accrediting agencies were both in place and there was sufficient consensus on their reliability to permit state and federal agencies to use their findings in their determination of eligibility.

2. In relying on private-sector accreditation procedures, the federal government could avoid confrontation over the issue of constitutional prohibition of control of education.

3. It was then believed that the Commissioner's listing of nationally recognized accrediting agencies, while accomplishing its regulatory aims, was benign and ministerial enough that it would not draw a constitutionally-based challenge.

Chambers (1983) suggests that the federal government avoided constitutional constraints but continued its efforts to accomplish social policy objectives by monitoring a more aggressive role in "using, reviewing, and regulating these private associations" (p. 235). Finkin (1978) argues that even that limited oversight role lacked statutory authority.

To make the assumption that the interpretation and administration of laws passed by Congress ought to fall equally on all federal agencies without regard to constitutional restriction is a serious flaw in both agency orientation and practice. The circumstances of fiscal and legal oversight, its administration procedures and assessment mechanisms, must be shaped by an understanding of both the institutions that the laws were meant to affect and the constitutional limitations of the federal government. Trivett's (1971) extensive study of accreditation indicated that a basic difficulty in the relationships between the federal government and postsecondary institutions stemmed from the "absence of clear authority for the federal government to spend money for education and subsequent inability to regulate those expenditures" (p. 87).

The Constitution does not provide for a direct role by the federal government in education; this responsibility has been historically and appropriately assumed by the states under the 10th Amendment. The "Reserve Clause" gives states the authority to both directly establish and charter institutions within their respective boundaries. This Constitutional prohibition of federal control in education is reflected in Section 432 of GEPA (20 U.S.C. 1232a) which consolidated twelve provisions enacted in federal law since 1950.* However, under the conditions provided for by the 18th Amendment, the General Welfare Clause, previous administrations created a formidable number of special purpose funding programs that directly or indirectly allow appropriations to flow to postsecondary institutions. The founders of the Constitution were at once wise to restrict the role of the federal government in the control of education and were enlightened in recognizing that there may be some educational objectives that can best be served by federal support. Reconciling this principle of federal support without federal control has emerged as the singularly most important issue in determining the federal government's position with respect to the use of private-sector accreditation and regulation.

*P.L. 874, Section 7(a), 1950; P.L. 83-248, Section 8, 1953; P.L. 84-824, Section 102, 1958; P.L. 815, Section 12(a), 1958; P.L. 97-447, Section 397, 1962; P.L. 88-204, Section 407, 1963; P.L. 89-10, Section 604, 1965; P.L. 89-329, Section 8046(a), 1965; P.L. 89-698, Section 104, 1966; P.L. 88-120, 1968; P.L. 91-230, Section 422, 1970; P.L. 92-318, Section 717(b), 1972.

II. THE EMERGING CHARACTERISTICS OF INSTITUTIONAL ACCREDITATION

The wide diversity of program styles, approaches, and sponsorships that characterize postsecondary education in the United States makes the task of establishing uniform standard procedures administered through a central agency clearly impossible. Accreditation has been characterized by Young (1983) as a loose federation of independent institutions, associations, and public agencies that comprise disparate interests, style, approaches, and forms of governance. What brings these entities to work in concert is a common interest in institutional evaluation and improving the quality of education. The concept of accreditation evolved as a voluntary, nongovernmental process of self-regulation which was structured to reflect an accommodation of institutional characteristics and interests, and served publicly beneficial ends. The characteristics of accreditation include its strong traditions of voluntary self-regulation, dependence on evaluation, and its primary concern for institutional quality and improvement (Hope, 1977; Seldon, 1977; Young, 1983).

Volunteerism

The ever-increasing involvement of the federal government in the accreditation process has inevitably affected its voluntary nature. The resistance of accreditation agencies to government intrusion has been reflected in the overt concern of accreditation literature with the role of the federal government while minimizing the existence of a substantial commitment to accreditation as a private, voluntary activity.

The accreditation process is fundamentally one that stresses free choice. It was developed by institutions that agreed to voluntarily regulate themselves to improve the quality of education and depended on the service of volunteers drawn from member institutions and professions. These volunteers participate as members in self-studies and on accrediting review teams, commissions, and boards of accreditation associations. The only remuneration received by most volunteers for their services, aside from small honorariums, is reimbursement for travel expenses. The staffs of "accrediting associations and commissions are generally quite small, often consisting of an executive and a secretary" (Harcleroad, 1983, p. 37). These staffs are supported by institutional and professional membership dues.

Self-Regulation

The undergirding principle and long tradition of accreditation is self-regulation. Self-regulation recognizes and is founded on the willingness of its membership to govern and direct their own actions and its belief that this method is more effective and preferable than any form of external regulation. Individuals as well as institutions consent to self-regulation in that the bases of evaluation are agreed upon, standards of behavior are known, the purpose of participation is acceptable and shared, and failure to participate may draw sanctions from their peers. However, social norms of behavior, laws, and regulations have little effect on individuals or institutions that are not involved with the tradition of self-regulation and elect to remain

outside of that voluntary domain. The shift in educational practices and the emergence of new postsecondary institutions, in part based on new technological applications to learning, have challenged independent accreditation practices and confused postsecondary institutions as to what is acceptable behavior. Self-regulation, the centerpiece of all accreditation (Harcleroad, 1983), is facing rigorous challenges as educational technology advances.

Evaluation

For postsecondary institutions, accreditation serves principally as a means by which they can delineate, obtain, and provide useful information on which they can judge decision alternatives (Stufflebeam, 1971, p. XXV). The process of evaluation is grounded in the process of self-study that includes the institution's defining and specifying its aspects or its program's functions that will be assessed; collecting, organizing, and analyzing that information with the assistance of peers serving on external review teams; and synthesizing this data in a form that is ultimately useful for decision-makers. The process is focused on the improvement of educational quality, in terms of the institution's objectives, as judged by peers in a substantive review process.

An important shift in evaluation, moving from an emphasis in process to outcome (Harcleroad, 1983), occurred in the early part of the 1970's. This transition in evaluation theory had a singular impact on accreditation. According to it, the assessment of "quality" is elusive

and can't be rectified; it is a concept, not a thing that can be inclusively measured or itemized; the task of measuring quality is difficult at best and can only partially accommodate quantification, and is increased in complexity by the use of a process that considers the multifaceted variables and diffuse aspects of education and educational institutions. The focus on this quantification of education can only measure artifacts, not quality per se. Hope (1977) suggests that assessing the quality of libraries, faculty governance, facilities, ethical practices, and financial stability as artifacts in themselves does not measure the quality of education, nor can the manipulation of these elements or processes guarantee improvement or quality in education. However intangible and elusive quality may be, it is inexplicably pervasive and recognizable. As Young (1983) notes, "The genius of accreditation is that it began with an impossible task of defining educational quality...and evolved, by trial and error, into a process that advances educational quality" (p. 13).

Fragmentation

The proliferation of accrediting agencies was in direct response to the expansion of professional occupations, the need for legitimization, the public's need for assurances of quality, and access to federal funds (Ginley, 1977). However, the uncontrolled expansion in the numbers of accrediting agencies is fragmenting the process and inundating institutions, and may not be in the best interest of the accrediting associations, postsecondary institutions, and the federal government.

There is little disagreement that there is a need for determining educational quality on the basis of predetermined educational standards or any disagreement that there is a need to identify educational programs and institutions that fulfill these stated educational criteria. However, there is considerable disagreement as to the wisdom of providing these assurances by expanding the number of accrediting agencies rather than modifying existing capabilities. Although the Council on Postsecondary Accreditation (COPA) has made progress in controlling this expansion, it has become clear that without an improvement in state chartering methods and procedures, current efforts will not be adequate to prevent entrepreneurial use of the process. The public has a reasonable right to expect prudent assurances of educational quality through the accreditation mechanism. This process can be protected if the agencies themselves, with adequate bridges to the federal government and state governments, take a leadership position in defining appropriate roles and areas of responsibility.

Council on Postsecondary Education (COPA)

COPA has emerged as a national umbrella organization of the independent accrediting associations and, in recognizing the increased role of credentialling, has assumed a leadership role in restructuring the accreditation community, taking the initiative to strengthen atrophied state regulatory capabilities with respect to chartering, registration, and licensure mechanisms. These efforts fit well with federal deregulation and decentralization efforts as well as society's increasing demands for accountability and assurances of education

quality. In restructuring, the accrediting community has moved toward consensus, reexamined its role with the federal and state governments, and advocated a more responsible yet imaginative definition of shared responsibilities and has moved to arrest the deterioration of regional associations. COPA has, by virtue of its proactive stance, begun to restore public confidence in the academy and its ability to govern itself.

State Governments

State governments are enfranchised, not constrained by the Constitution in its creative and regulatory powers of educational institutions. The Carnegie Commission (1982) notes that agencies of state governments have, as an essential core function, the "obligation to protect the rights of citizens and to oversee the use of public funds" (p. 80). An appropriate balance between self-regulation of the academy and the essential prerogatives of the states must be maintained. As much as it is inappropriate for accrediting agencies to perform regulatory audit functions, it is equally inappropriate for the states to evaluate the quality of educational institutions. Neither possesses the capability appropriate to the other's task and must, in the interest of public assurances and good management, use the capabilities of each toward a common goal.

In this current environment demanding accountability, state agencies have moved toward becoming more deeply involved in educational matters including the evaluation of academic programs. In addition, fiscal

control and budgetary reviews have been increased, and coordinating boards and planning mechanisms have expanded their activities. The atrophied capability, caused by a dramatic shift in program initiative and responsibility to the federal government that began twenty years ago, is gradually being reversed. Current policy initiatives to return the control of education to the states has articulated a trend initially observed in the accountability movement of the early 1970's. However, in order to accelerate this movement and bring this policy to fruition, the federal government must contribute to creating the conditions which allow for deregulation and mutually satisfactory role definition among members of the "triad."

III. ACCREDITATION AND THE FEDERAL INTEREST

The changed environment that has forced a review and search for an appropriate balance between the 10th and 18th Amendments of the Constitution has also created a need for new procedures to resolve old conflicts. However, those procedures must be wisely constructed in a manner that will allow refinements to meet new challenges in a dynamic, future environment.

The interest of Congress in stimulating greater and more equitable national achievement through special-purpose funding programs has also forced concern that only reputable postsecondary institutions of recognized quality should participate in these programs. Institutional accreditation has become, contrary to its purpose, an index of quality

of which federal funds are awarded or withheld. This quasi-governmental function imposed on accrediting agencies has also posed a dilemma for government: it has moved towards more regulation.

Since their inception, accrediting agencies have been concerned with the quality of training, ethical practices, and the financial responsibility of institutions. However, accrediting agencies have strongly opposed the position of the federal government that, through their recognition process, would force accrediting associations to ensure the probity of institutions. This would force the agencies to police institutional practices and, in effect, to become a regulatory arm of the federal government.

In order to avoid the constitutional issue of control of education, the federal government's interest in consumer protection issues would be passed to the private accreditation agencies. The federal government expected accrediting agencies to become responsible for the improper conduct of institutions, review truth in advertising, verify loan default rates, and examine practices and tuition refund policies. In essence, the federal government wanted accrediting agencies to expand their functions of being authoritative judges on the quality of training and institutional improvement as well as on ethnical practices. The fit between accreditation agencies' historical interest in probity and ethical practice issues, with respect to the characteristics of educational institutions, was assumed.

In its regulatory zeal, however, the federal government revealed a gross misunderstanding of the nature of accreditation agencies' interest in probity and ethical practice issues. This concern with the financial health and fair practices of the accreditation process for the past eighty years was different from the legal and regulatory stance expected by federal agencies. Accrediting agencies considered the probity of institutions in terms of an institution's honesty and fair dealing; that is qualitatively different from the government's position of tested and verified financial honesty, which carries a meaning that goes beyond general uprightness. The degree of specificity required to meet the government's intent transcends the interest and capability of accrediting associations and moved them toward a regulatory role that more properly should be carried out by state governments, the General Accounting Office (GAO) and the U.S. Department of Justice.

The manner in which the government guarantees adequate representation of public concerns through accrediting agencies is a matter of increasing concern. Their efforts to strengthen and improve the quality of education serves both socially desirable ends and the public good. In this sense, they share with the federal government a concern that those ends be safeguarded in both the accrediting process and agency operations. However, the government, moving accrediting associations in the direction of technically specified terms to serve legal and accountability ends, has also generated a degree of tension that has strained a mutually beneficial relationship. In the past, federal regulatory interests have looked upon accreditation as an outcome, a certification of quality, rather than as a process for the

continuous improvement of quality, and has imputed a public interest in the process that requires some form of regulation. The federal government has pressed for its procedural standards to apply to nongovernmental, accrediting agencies in order to better serve their interests.

This posture is clearly contrary to trends that began during the early 1970's that emphasized the virtues of limiting government regulatory interference. This attitude not only goes against current policy, but is also a serious impediment to the ability of accrediting agencies in serving the public interest by improving the quality of educational institutions. In order to achieve these publicly desirable ends, federal regulatory tendencies must be tempered.

Recent Policy Shifts

The Serviceman's Readjustment Assistance Act of 1952 set the stage for both appropriate and inappropriate uses of private-sector accreditation (Bendor, 1983). By relying on the findings of existing accreditation agencies, the federal government, at face value, effectively avoided constitutional prohibition against direct involvement in the internal affairs of colleges and universities. However, the legislation, in recognizing the existence and reliability of private accreditation agencies, in effect created an unintended use of accreditation as a part of determining institutional eligibility for federal funds. A Congressional attempt to correct some flagrant abuses of the G.I. Bill included Section 523 of the 1952 Veterans Readjustment Act, which

stated: "The Commissioner shall publish a list of nationally recognized accrediting agencies and associations" which he determined to be reliable authorities as to the quality of training offered by an educational institution (Finkin, 1978, p. 2). This language became the center of the debate as to what were the intent and appropriate uses of accreditation. Essentially, this section cast accreditation agencies in a regulatory role through the federal requirement that they seek official recognition by the Commissioner of Education to enforce policies of the federal government in accrediting programs or institutions. This legislation of the federal government attempted to reconstruct the functions of private-sector accreditation agencies and contributed toward moving them in the direction of becoming quasi-governmental organizations, which was both ambiguous and misleading (Bender, 1983; Kaplan, 1975). Stimulated by the social advocacy milieu of the late 1960's and supported by the Education Amendments of 1972, accreditation came to be viewed as a powerful, coercive instrument for promoting national social policies. The primary purposes of accreditation were reinterpreted by the federal government, new applications created, and constitutional authority for the government to act in an educational regulatory capacity was strained.

An Analysis of the Education Amendments of 1976, the Middle Income Student Assistance Act of 1978, and the Higher Education Amendments of 1980 indicated a transition in Congressional attitudes. Although it was apparent that Congress confirmed the importance of student assistance programs, they broadened the scope to include the middle class and moved in the direction of stimulating increased participation

of states through matching provisions and increased family contributions. The "liberal consensus" (Finn, 1982) that thrust the federal government into a rigorous, proactive social engineering role during the 1960's and early 1970's relied on a strong central government, budget increases, and strategic reliance on regulatory and legal procedures to realize policy objectives began to crack (Wilson, 1982). The combined effect of an uncertain economy and inflation diminished rather than expanded federal budgets and brought to the front policy conflicts that were once assuaged by the flow of federal funds. The objectives and policies that continued to be espoused by the liberal consensus became increasingly more parochial and remote from the changes occurring in the economy and public attitudes. These policies and objectives stressed qualitative benefits and relied on budgetary growth during the late 1970's when the general public was experiencing financial stress and elected officials were using objective measures to determine benefits and accountability for increasingly scarce public funds.

Policy shifts that impact government functions are most advantageously observed in a longitudinal, historical perspective and best understood in broad terms, as a dynamic relationship driven through popular consensus. The Reagan Administration's policy agenda represents a clean break in philosophy with that espoused by the earlier liberal consensus. More conservative views have been abruptly introduced in matters concerning the political economy and social policy. The Administration's strong faith in the private sector, its intent to reduce federal regulation, and its efforts to restore state and local

control of education, have significant implications for formulating a new position on the use of private-sector accreditation in the eligibility determination process. These new policy positions provide both an opportunity and a framework for jointly arriving at appropriate role definitions for members of the "triad." The deliberations undertaken during the 1970's over defining appropriate roles and condemning the aggressive position of the federal government bore little fruit.

From Policy to Practice

The modification of some policies and practices of the federal government has moved from initially prominent themes in the direction of modifying agency practices. The Reagan Administration's 1980 party platform pledge to curb federal regulatory excesses and check the growing intrusion into the internal affairs of postsecondary institutions was, in part, addressed by the "Presidential Task Force on Regulatory Relief," chaired by Vice President Bush. Federal regulations were examined by the Task Force to determine if existing regulations exceeded specified legal requirements and Congressional intent and to assess whether tight regulatory specifications, characteristic of previous administrations, might be replaced by broad performance standards. Secretary Bell, consistent with both the philosophical shift and policy emphasis, initiated activities to modify and ease the burden of federal regulatory behavior in the U.S. Department of Education.

The 1978 report by the National Commission on Research entitled "Accountability, Restoring the Partnership" suggested that it is both reasonable to modify and administer regulations that are sensitive to the characteristics of the institutions, and unreasonable for institutions to expect exemption to federal requirements while enjoying public benefits. The Commission also indicated that a central issue between the federal government and postsecondary institutions arises in the area of the fiscal administration of institutions and the need of the government to fulfill its program objectives and stewardship responsibilities. An equitable resolution of this issue is fundamental to the implementation of new policy initiatives.

The origins of this issue are deep-seated and reflect the differences between federal and institutional organizations with respect to fiscal accountability and administrative practices. The Carnegie Foundation's 1982 analysis entitled "The Control of the Campus: A Report on the Governance of Higher Education" noted that the federal bureaucracy has limits to its capacity of performing oversight functions at the campus level and is flawed by: (1) its tendency to generalize policy from the worst cases, and then to construct and impose a rigid and uniform standard on all institutions; (2) its chronic vulnerability to acceed to political pressures for exemptions; and (3) erratic shifts in funding and requirements, as well as clumsy legislation.

Perhaps the most serious issue affecting postsecondary education was the cumulative impact of federal regulations that inundate institutions with requests for data and endless justifications for administrative

decisions. The report pointed out that "recipients of federal grants are now subject to 59 legislative and regulatory requirements regarding administration and social policy" (p. 66) which are subsequently overlapped with state accountability programs and multiple and diverse accreditation reviews.

All things considered, two points become eminently clear: (1) trying to administer institutions through federal oversight is both impractical and ignores the principles of good management; (2) the work load generated by federal, state, and accreditation agency oversight programs is burdensome, costly, and does not achieve the desired ends or improve efficiency; and (3) the system of institutional oversight in a confusing web that has distorted its original intent.

Although improving the management of the federal government's regulatory functions is a worthy goal, more fundamental changes are required. Postsecondary institutions must discover more effective ways to regulate themselves, and the "triad" must jointly define appropriate and complementary oversight roles. The underwriters' laboratory provides an interesting example of mutually beneficial cooperation between government and industry. Although there is a substantial qualitative difference between standardizing the "threads, bolts, and screws" and assessing institutional quality, it does suggest that viable mechanisms can be created that protect the individual and shared interest of the private and public sectors.

IV. THE APPROPRIATE USES OF ACCREDITATION

The pervasive misunderstanding (Bender, 1983) of the role and uses of accreditation is shaped by the diverse interests of federal and state governments, colleges, universities, and accrediting agencies which frequently act on the basis of these misperceptions. These multiple and diverse interests immersed in a changing political, economic, and social environment are, as in the past, playing a central role in shaping both the form and emphasis of accreditation. Although a modest internal consensus on the basic principles of accreditation has emerged over a period of time, wide differences among key members of the "triad" has led to inappropriate uses. The principle that accreditation should encourage and assist postsecondary institutions in improving the quality of education and serve the public interest are fundamental and compatible. However, in pursuing the shared goal of serving the public interest, ways must be identified that avoid compromising the essential characteristics of accreditation as a voluntary, self-regulating, nongovernmental evaluation procedure. The primary difficulty in sorting out what accreditation should and can do is complicated by ascribing undue importance and power to it (Seldon, 1977).

Accreditation associations are well suited to serve as a means of identifying institutions and programs that meet minimum standards, stimulate the raising of standards by encouraging improvement and assisting in protecting institutions and programs of study from inappropriate internal and external pressures. The public interest is

served in the identification that institutions have voluntarily met minimum standards of quality as related to appropriate and shared educational objectives, provide conditions conclusive to educational achievement, provide evidence of accomplishing these educational ends, and provide assurances of institutional stability.

The direct aim of accreditation is to stimulate improvement which may be, according to Seldon (1977), a by-product of the participation of faculty, students, and administrators in the self-study process. The voluntary, peer review component provides a means for the dissemination of educational development information that contributes to the improvement process. The protection function, although infrequently surfacing, remains significant. Accrediting associations do not have direct means of constraining internal or external forces that may interfere with the educational process. However, implicit sanctions have effectively deterred interferences and contributed to protecting institutional and program integrity.

Although these basic purposes appear to be limited in scope, they are by no means simple or lacking in substance. Indeed, they are crucial to postsecondary education. Establishing mutually agreeable standards and evaluating educational quality are difficult and elusive undertakings. In addition, measuring educational effectiveness is not becoming easier as the number of institutions and new methodological approaches increase. As educational technology continues to expand, the traditional means of evaluating quality and translating student efforts into familiar standards of academic credit has posed a serious

problem for accreditation. Under these new circumstances, the traditional means of evaluating quality are not irrelevant. However, determining the degree of confidence that can still be placed in familiar criteria such as institutional structure, condition of learning, and financial support as indicators of educational quality is essential as examining the need to supplement these traditional means if accreditation is to continue to meet its obligations.

Accreditation plays a significant role in postsecondary education and serves an important public need, although nongovernmental in function and authority. To continue to function as an effective force for the improvement of educational quality, accreditation agencies need to remain reasonably independent and focused on appropriate tasks for which they are well suited, rather than undertake obligations--however worthy--which may compromise their fundamental aims and which they cannot adequately support.

V. INAPPROPRIATE USES OF ACCREDITATION

Although external forces continually misunderstand the purposes of accreditation and view the process as a convenient means to pursue their particular ends, accreditation should not be put to uses for which it was not designed or which may distract the purposes and responsibilities which it can reasonably be expected to sustain. Accreditation has been responsive to environmental shifts, changing its emphasis and functions over a period of time. The accreditation

community must immediately protect and continue to do what it does best and resist pressures that may push it beyond its capabilities or compromise its purposes. It must continue to refine its purposes, clarify its responsibilities, and improve its processes.

The external environmental factors that have stimulated an increased use of accreditation beyond its initial purposes indicate a significant growth in professional specialization, an increased need for legitimacy, the determination of eligibility for federal funds, and social consensus--a belief that you can change society by changing the purposes of accreditation. In addition, accreditation was affected by internal forces that needed a means to determine whether an institution or program met established minimum standards and whether credit could be transferred. Also, the involvement of faculty, students, and administrators in institutional evaluation and goal creation processes was a desirable and necessary mechanism for stimulating improvement of institutional quality.

Bender (1983) notes that the groups that have most flagrantly tried to use accreditation for their own ends and which depart from its shared basic principles involve federal and state governments, professional organizations, and postsecondary institutions. The federal and state governments have viewed accreditation both as a useful adjunct to their regulatory missions but in some instances perceived accrediting agencies as quasi-government regulatory bodies. Professional organizations have seen accreditation as a useful means for establishing their legitimacy with the public and advancing the

purposes of their associations. Postsecondary institutions or departments within them have long recognized that accreditation or the implication of sanctions can serve as a useful lever for accomplishing particular institutional or program ends.

Perhaps the most critical, because of the strength and duration of external pressure, is the federal government. The Office of Management and Budget (OMB) has been particularly critical of accrediting associations for their not providing stringent oversight of their members that would enable the federal government to use the status of accreditation as a seal of approval. This oversight function, desirable for government purposes, would detract from the principal purpose of accreditation as a means of pursuing educational quality through self-improvement. The necessity for costly and continuing oversight mechanisms, inspection, and investigation could be resisted by the membership in terms of expense and intrusion and, if paid for by the federal government, would be in conflict of the 10th Amendment's prohibition of control of education.

Seldon (1977) observed that the federal government's listing of approved accrediting agencies required it to enforce policies when determining institutional or program accreditation. Although these social goals may be acceptable, the use of accreditation to pursue these ends does not appear to be either appropriate or particularly effective. The government has both audit and legal investigative and prosecution branches that are more appropriate and able for ensuring that federal policies are carried out than are accrediting

associations. The necessity and desirability to disturb a decidely useful private-sector capability when an existing federal capability both exists and is designed to serve these ends is excessive.

Accreditation serves the unique and individual interests of both the federal government and accrediting bodies. However, as long as accreditation is tied to eligibility determination for federal funding programs, conflicting interests will remain.

VI. THE FUTURE OF ACCREDITATION

Ideally, accreditation should emanate from basic and shared philosophical principles rather than acquiescing to short-term political expediencies which have in the past impeded and distorted the development of workable roles, standards, and relationships with the federal government (Bowen, 1981). Throughout the the past two decades, the federal government has attempted to force private accrediting agencies to assess institutional probity.

However, this is only one of several issues inherited from the past that must be addressed jointly by accrediting bodies, institutions, the federal government, and COPA. Some of the continuing problems that must be addressed before progress can be made include: (1) the development of criteria for accreditation that emphasizes ongoing institutional self-study, experimentation, and improvement rather than minimum standards; (2) satisfying the need for quality assurance in

emerging specialized institutions and professional programs without increasing the number of accrediting associations; (3) accommodating the changes in instructional methodology stimulated by rapid technological advances; (4) serving the federal government's interest in accreditation without increasing its direct involvement in the accreditation process or in education; and (5) strengthening the development of the infrastructure of private, voluntary accreditation agencies, regional, and COPA to reduce fragmentation and increase coordination and quality of services provided (Seldon, 1960; Young, 1983).

The progress made during the last several decades in responding to environmental shifts and developmental problems are both reassuring and disheartening. On the one hand, the literature suggests that accreditation has moved away from an earlier preoccupation with minimum demands towards (1) continued reevaluation, (2) the improvement of education emerging as the principal purpose of evaluation and encouraging experimentation, and (3) COPA emerging as a "unifying national presence" (Young, 1983, p. 384). On the other hand, (1) professional specialization has contributed to continued fragmentation in accreditation, increasing its complexity; (2) governmental interference has only been partially checked; (3) state agencies have not revitalized their capabilities to more effectively handle their regulatory responsibilities; (4) COPA has not adequately addressed the issue of cooperation between accrediting agencies; and (5) the pervasive misunderstanding about what accreditation is and what it can accomplish persists.

In a long-term perspective, it appears that accreditation has emerged with a sound philosophy and a growing sense of community, and has established a unifying national commission that has contributed to its ability to address new issues affecting postsecondary institutions in a rapidly changing environment. The literature suggests that postsecondary institutions are facing an unprecedented challenge that will force them to adapt or succumb, and in this dynamic context accreditation must address issues in the future that will challenge many of its currently accepted precepts on which its evaluations are conducted (Cross, 1984; Drucker, 1981; Niebohr, 1980). Rather than being a victim of the impending revolution, accrediting associations must become the champion of defining the forms, characteristics, and measures of acceptable performance that fit a postindustrial (Bell, 1973) learning society that is markedly different than today's. This should not take the form of an exercise in projecting educational futures, but rather a study directed towards the survival of future education. The changing values of American society (Yankelovich, 1981) will impact education as it moves toward a high-technology society (Evans, 1979) and a society in which learning becomes more important and widespread. If the futurists are even partially correct, American education will experience organizational restructuring, more toward outcome-based evaluation of student learning and the effectiveness of instructional delivery systems, place a heavy reliance on computers and telecommunications systems, and radically redefine the concept of work. In such a turbulent environment, society will look to the colleges and universities as new social institutions to assist in responding to these disconcerting developments. If they do not respond in a timely

fashion, industry will eclipse their initiatives and assume their academic prerogatives.

In either respect, accrediting associations will have the singular responsibility of determining which educational programs are appropriate or inappropriate, and effective or ineffective. In a dynamic and changing technological society, the evidence of competence (i.e., credentials) may increase in importance and, concurrently, the assurances that credentials are pertinent, valid, and reliable will increase in importance (Young, 1983). Commensurately, instructional delivery systems and learning methodologies will undergo a radical metamorphosis. Rather than reinforcing traditional pedagogical approaches, accreditation associations must respond to these dynamic changes if the process of accreditation is to remain prominent and continue to play a critical role.

VII. ORGANIZATIONAL ENVIRONMENTS AND CHANGE

> "Organizations are social inventions that are both fluid and dynamic. They move in time and space, act and react, are shaped by a combination of internal and external factors that both threaten survival and provide the impetus for modification." (Bjork, p. vi., 1983)

Being social products, the structure of modern complex organizations are shaped by powerful historical and environmental forces (Meyer and

Rowan, 1978), and thus, changes in the environment will signal, with varying degrees of rapidity and magnitude, the emergence of changes in the organization (Blau and Schoenherr, 1971; Meyer, 1978). Organizational survival requires adaptive as well as directive action in those strategic areas (Barnard, 1938) where the organization has discretion (McCauley, 1963; Thompson, 1967). As environments change, the organization must change the configuration of its structure in such a way that interaction with other elements will result in a viable coalignment between the organization and the environment (Bjork, 1983; Blau and Scott, 1962). The structure of an organization reflects its environment, serves as a feedback mechanism through which it can influence its environment, and creates a powerful force for organizational growth.

Understanding the manner in which external environmental change impacts the structure and relationships of organizations is of crucial importance to those who formulate policies and direct the affairs of institutions. An increase in the intensity of change, accompanied by uncertainty, emphasizes the importance of understanding the forces and factors that stimulate change, insofar as these changes create opportunities for structural redefinition and enable organizations to coalign with new environmental conditions. Currently, the need for change is embedded in both a condition of financial stress and the emergence of conservative values in American society. These external environmental shifts have implications for the roles, structure, and interorganizational relations of members of the "triad."

The natural tendency of organizations experiencing financial stress is to engage in both retrenchment activities that ensure proper stewardship of limited resources and to increase the level of political action directed towards more effective competition for public resources. Both activities are redirected toward increasing the efficiency of what the organization is already doing rather than examining, redefining, and restructuring the tasks and the organization itself. These actions appear to be both inappropriate and marginally productive with respect to pursuing appropriate and effective adaptation to changes in the external environment. As Peter Drucker observes, efficiency is doing things right; effectiveness is doing the right things.

The conditions of financial stress coupled with increasing demands for public resources and the unwillingness of the public to further tax itself created the circumstances for the federal government and state governments to begin to place a greater emphasis on accountability. An increasing regulatory posture emerged and, like retrenchment, pursued greater efficiencies.

The singular impact of the accountability movement was to increase the already heavy regulatory burden. The intrusion by the federal government in the internal affairs of postsecondary institutions was the result of social legislation, overzealous regulation, and executive orders. This response to public pressure for both social equity and accountability while providing improved access and opportunity for some groups had a concurrent effect of severely limiting institutional

flexibility. While the environment was undergoing rapid changes, organizations were tightly bound by external regulatory controls. Faced with the loss of flexibility and commensurate loss of local control in the decision-making process, effective innovation was sacrificed to more traditional retrenchment and regulatory practices. The consequences clearly exacerbated an already untenable situation.

Tyack and Hansot (1982) suggest that major strides in the improvement of public education have been made during periods of national social and economic dislocation. These exigent conditions precluded incremental retrenchment, forced hard choices, and resulted in decidedly beneficial outcomes for public education. A uniquely essential element in this dynamic milieu was the high degree of public support for making hard decisions that both reduced traditional educational services and focused on innovations that more closely linked educational institutions to the changed values of society. Financial exigency created these circumstances that demanded flexibility, stimulated local participation in making hard choices, and generated public support for innovative solutions. Although current environmental conditions are not as dramatic as in previous eras, financial stress, a shift towards more conservative values, and emphasis on local control and deregulation have significantly altered this environmental context in which public education is embedded. However, the opportunity to make significant advancements in education ·ot depend on financial exigency as observed in the past by Tyack ısot (1982) as much as it depends on what results from exigency ıtions: a move toward increased flexibility and public support.

These two essential conditions can be created if present policy initiatives are rigorously pursued. Deregulation may provide a measure of flexibility for redefining the fundamental purposes of educational organizations, and the return of control of education to the states may stimulate an increase in participation and support for local decisions. The public will support what they help to create.

Stimulating Innovation

Innovation, the process of bringing new approaches to bear on solving problems, is clearly being recognized as a national priority in industry and education. As environmental conditions shift and become more complex, problem-solving approaches that are focused on improving organizational performance through improving work methods and quality control are becoming increasingly hard-pressed to produce satisfactory results.

In periods of lean resources, the limitations of improving efficiencies through incremental tinkering becomes increasingly evident, and focusing on effectiveness--doing the right things--becomes increasingly necessary. In an environment characterized by scarce resources, the capability of both the federal and state governments to invest in this reconstruction of education to address future needs and promote innovation is more sharply curtailed than under more stable financial conditions. Innovation involves considerable risk of financial, human, and political resources. Organizations under conditions of financial stress have a tendency to avoid risk situations even though maintaining

the status quo in itself is a high-risk decision. Indeed, the most effective approach to adaptation during periods of environmental shift may be to expand resources and stimulate innovation. Contrary to normative management responses that focus on finding solutions in efficiencies, a decline in financial resources may also produce the climate in which organizations can more easily pursue bold adaptive strategies and enjoy increased public support.

It is problematic whether large complex organizations that have tendencies of resisting and subordinating change to the regularities of the bureaucracy can accommodate innovation. The need to create the conditions in which experimentation and innovative ideas are developed requires both external stimulation and internal leadership. Organizations need to be encouraged to focus more attention and resources on constructing the future than on merely controlling what they already have and pursuing short-term efficiencies. Organizations tend to measure themselves and be measured by standards of the past--i.e., what they have done, rather than future directions--that is, where they are going (Kanter, 1984). They tend to allow their accomplishments and the regularities of the past to serve as a restraint on their pursuit of an uncertain future. This condition makes the organization a victim rather than the master of change. An organizational "preference for being guided by the past rather than by the future, by what is already known rather than what is not known" (p. 43) is a congenital condition of maintenance-oriented organizations. Kanter (1984) suggests that it is appropriate for organizations to be guided in part by the past, insofar as their performance is "measured

and compared against standards reflecting accumulated organizational experience" (p. 43). However, under these constraints, innovation will not be produced very easily. In these organizations, it would be difficult to stimulate or sustain innovation and change.

American education is at a critical watershed. The political economy and social values of the nation are shifting in emphasis away from educational equity toward educational quality (Wilson, 1982). Because educational organizations are in a new context, it makes past responses less effective. The external stimulus for change and improvement is there. However, the policies to move education toward more productive, innovative solutions have only partially been set in motion. Current policies that are directed toward deregulation and the return of the control of education to the states must be accomplished by the development of an appropriate federal role directed towards enhancing the policy and decision mechanisms in state agencies, local school boards, and accrediting agencies that have atrophied or failed to fully develop over the past twenty years because of a dominant federal role.

Accrediting Agencies and Change

Postsecondary educational institutions and accrediting agencies have a long history of self-regulation and an exemplary record for the stewardship of public funds. The decentralization initiatives of the Reagan Administration may abruptly shift the emphasis of the federal government from an invidious regulatory stance to one that defers to more appropriate and effective oversight mechanisms. Although this new

limited role is constitutionally necessary, it ensures, like good management practice, that decisions can be made as close as possible to where they will be carried out.

Under these changed circumstances, the respective roles of members of the "triad" will also have to shift. Seeking a complementary set of interorganizational roles while preserving the fundamental values and prerogatives of each member will require cooperative, joint resolution. To ensure the viability of this dynamic relationship, postsecondary institutions must protect and pursue excellence in teaching and scholarly research, accrediting agencies must evaluate and stimulate their continuous improvement of educational quality, and the federal and state governments must ensure the proper stewardship of public funds and protect constitutional rights.

The federal government could significantly improve its stewardship responsibilities and at once remove itself from constitutional conflict if it divested itself of all regulatory functions in education that carry with them the implication of control. The functions that most often create controversy, generate claims that the federal government is dominating and intrusive, and contribute to reduced flexibility are those that involve fiscal audit and civil rights enforcement. The tendency of past administrations, seeking to use the federal government as an instrument for change, used all of its agencies to enforce its social policies without concern for whether that process compromised its constitutional authority or the integrity of the accreditation process from which it derived significant benefits. This divestiture

does not imply a weakening of its stewardship obligations, but rather recognizes that other branches of government have a more direct responsibility and have more focused capabilities to perform these functions than a wide array of federal agencies.

As noted earlier, the institutional accreditation process gives full consideration to the financial health as well as the honesty and fair dealings of an institution. However, the process of evaluating an institution's adherence to standards is qualitatively different than performing an audit or pursuing a rigorous examination of the institution's compliance with consumer protection and civil rights legislation. The responsibility to perform these functions which imply control are more appropriately the functions of state governments and specific federal agencies rather than the Department of Education and private voluntary accrediting associations. Information concerning an institution's financial probity and adherence to consumer protection and civil rights laws should be considered in the accreditation process but not generated as a part of the review process. Suppressing federal regulatory tendencies and shifting oversight responsibilities to non-education branches of government is perhaps the most controversial--if not the most formidable--obstacle in modifying the role of the federal government in the accreditation process.

The convergence of environmental pressures have created an opportunity to reconstruct roles and relationships that are essential to the accreditation process rather than creating a crisis. In this seemingly turbulent milieu, the diversity of issues, organizations, and

instructional methodologies have expanded, the assumptions and processes of regulatory controls have been challenged, and the recognition that many centralized structures have malfunctioned is being forced (Reich, 1983; Toffler, 1980). The centralized tendencies of the federal government are being increasingly perceived as the source rather than the cure of institutional difficulties. The regulatory structures that in a past era provided a momentum for accomplishing an unprecedented expansion of education have become obsolete. Shifting environmental demands now require new structures to fit new circumstances.

Organizational structures can be created and recreated to fit different environmental contexts. Although formidable, the challenge of recognizing shifts and adjusting structures to coalign with new environmental demands should not overshadow the equally compelling need to both preserve organizational diversity and imbue the emerging patterns with the characteristics that facilitate rather than suppress change. The breakup of old structures often results not in crisis or chaos but in the emergence of wholly new organizational structures that more adequately fit new needs and conditions. However, the tendency of highly centralized organizations to resist change and, when pushed over the threshold of resistance, to create more elaborate bureaucratic systems of managerial control, can inhibit the change process. Encumbering more layers of staff to devise new rules and procedures, design and monitor systems of performance appraisals, referee the inevitable confusion over responsibility, and mediate conflicts serves to protect vested regulatory interests, fails to acknowledge the

magnitude of environmental shifts, and inhibits the creation of new structures designed for rapid adjustment and problem-solving.

In traditional, highly centralized organizations, novel situations are regarded as exceptions. However, in an emerging environment where change creates novelty, the exception becomes the rule, and standard operating procedures, encumbered by bureaucratic rules, become dysfunctional. Novelty and flexibility are not accommodated by centralized bureaucratic organizations. They are too diffuse and internally fragmented to develop a concentrated focus on novel issues and can't accommodate new approaches to new problems.

The superstructures of large bureaucracies are designed for stability, not adaptability. The future of American education depends on adjustment to a sharply different world, rather than preserving the regularities of management that are inappropriate to new tasks. Unfortunately, adjustment has not been a central theme of federal policy over the last three decades. Rather, historic preservation of an increasingly complex and outmoded regulatory system has endured. Major structural changes are needed that promote adaptability which builds into the structure a means by which it can evolve and resolve continuous novel problems. Clinging to the fiction that structural and regulatory tinkering can meet new demands is disconnected from the unyielding reality of environmental change and the limitations of centralized organizations.

Leadership and Organizational Change

Within the context of a major shift in federal policy and a federal bureaucracy that inherently resists change, leadership becomes a key element in initiating and directing the organizational change process. Leadership has been defined in terms of organizational goal achievement (Bass, 1981; Urwick, 1953) and is directed towards organizational survival. These goals are personified and facilitated by organizational leadership (Bjork, 1983). Mumford (1909) suggests that the emergence of leaders depends on skills required to solve problems existing during periods of organizational stress, change, and adaptation. The expression of new ideas in the process of organizational adaptation must be translated into appropriate strategic directions for an enterprise that is no longer in tune with the contingencies it faces.

External environmental pressures, according to Terreberry (1968) and Meyer (1978) impinge on all organizations, but their influence is mediated through persons in leadership positions. Leaders take charge at juncture points of relations between the organization and its environment (Herbst, 1962; Katz and Kahn, 1978; Rice, 196) in a way that is associated with organizational effectiveness and goal attainment. Leaders are in a position to perceive changes in the external environment that are of a sufficient magnitude to imply the need for structural reorganization. Levin (1951) notes that the systematic organizational changes employed to maintain new levels of equilibrium with the environment are of a scale that demands leadership.

The literature on organizational adaptation to environmental changes places a strong emphasis on the strategic location of leaders and the need to not only perceive environmental shifts but also adjust the organization in a manner that enhances its effectiveness and survival. Significant shifts have occurred in the social, economic, and political values held by American society. The perception of these more conservative views stimulated a number of policy shifts in education (i.e., deregulation, an emphasis on quality, and a return of the control of education to the states). Although organizations are modified by external stimulation, they remain bureaucratic in nature and possess a strong internal dynamic to resist change. Organizational change depends on the leader's perception of external environmental change, an assessment of the magnitude of that change and, most importantly, the articulation of those conditions to the members of the organization in anticipation of appropriate structural modifications. Although bureaucracies are often perceived as massive, phlegmatic entities that defy change, they maintain a dynamic relationship with their environments, and thus adapt and survive. In moving an organization in the direction of change, the need to create and present a new public face (Sproul and Weiner, 1979) internally and externally becomes critical.

The perception of the duration of magnitude of environmental pressures by organizational leaders is neessary for moving an institution over the threshold of resistance. Although this view of the organizational change process provides a sound basis for creating and recreating structures to fit shifting environmental contexts, it has the

unfortunate bias of condemning organizational leaders to operate on a crisis management continuum. Moving into an anticipatory frame of reference in which organizational leaders use information on environmental conditions to challenge organizational patterns and create structures that fit emerging contexts, rather than addressing past problems, is a significant departure from traditional leadership. This approach doesn't diminish the function of exogenous pressures to stimulate change, but rather emphasizes the anticipatory, risk-taking, self-exitory aspects of leadership operating in a significantly more dynamic milieu. This new environment demands that leadership move from a reactive to a productive stance and organizational structures be deliberately designed for adaptability rather than inflexibility and stability that has dominated our institutional heritage. This structural baggage now imperils our future.

Notice of Proposed Rulemaking: An Opportunity to Create a Public Image of Regulatory Reform

The literature on cognitive imaging suggests that the process of initiation, innovation, and institutionalization is not restricted to new organizations. Many existing organizations go through similar transformations at various points in their histories (Kimberling, 1980), and in the process reveal the dynamics of creating and maintaining cognitive images. Thompson (1967) observes that organizations face uncertain futures and their survival is a concern of both local organizations and other organizations in their task environments. Even though an organization is confident of its ability

to face future demands, it must nonetheless create an image of itself, persuade others to share a similar view (Sproull and Weiner, 1979) and translate that image into actions (Rein and White, 1970). Defining a situation in an organization is an important preliminary task. This task precedes the creation of an image of an organization's future through social process and contributes to the success of that new public face.

Creating and facilitating change by gaining internal and external support is a complicated process. Defining an organization's situation, specifying reasons for failure of current action, and speculating on how its future can be different and more successful are critical human characteristics that are fundamental to the transformative process. Kimberling (1980) notes that during such transformations, certain administrators ca exert substantial influence by defining organizational situations and providing future directions.

Creating a cognitive image of the future organization is a crucial element in gaining internal and external support for change and requires strong administrative direction. As a social process, this action involves enlisting the support of individuals within the task environment. Persons who become associated with the social construction of the organization's cognitive image contribute to its viability. They provide information about the internal and external task environment, contribute to shaping its image, add to its legitimacy, assist in mobilizing support, confirm the correctness of the transformation decision, and continue to support the new public

face created. Sproull and Weiner (1979) note that the more successful the situation defining and image-creation process, the more specific the criteria (e.g., the divestiture of regulatory control of education) will be against which implementation can be judged.

In this regard, Bjork (1983) has proposed that:

1. The more imperative a structural change in response to an environmental shift, the more critical the involvement of influential persons.
2. The greater the involvement of influential persons in the internal and external environment, the greater the emphasis on institutional definition and cognitive imaging.
3. The greater the concern for cognitive imaging, the greater the utilization and specificity of measures to determine success.
4. The broader (internally and externally) the representation of individuals in institutional definition and imaging, the more likely goals will be attained.

This body of literature may contribute to understanding the forces that are associated with organizational change and suggest useful approaches that will assist in more effectively modifying federal policy.

The Notice of Proposed Rulemaking (NPRM) affords the U.S. Department of Education with a unique opportunity to engage both the focal organization (the Office of Postsecondary Education/Division of Institutional Eligibility) and other organizations concerned with eligibility and accreditation (institutions, associations, and state governments) in defining its new regulatory situation, specifying the practical and constitutional reasons for the failure of federal regulatory tendencies, and engage in discussions of how the future

federal role can be different and more effective. The social process of engaging these stakeholders in the internal and external organizational environment in public hearings and private conferences can contribute to the creation of a cognitive image of the federal government's new position concerning eligibility and regulatory controls. These discussions can contribute to shaping an appropriate role, add to its general acceptance, confirm the correctness of the new policy stance, and generate substantial internal and external support for the new public face.

Past efforts to stem the erosion in administrative relationships between the federal government and the accrediting associations must be understood in broader terms if change strategies are to be effective. Finn (1979) notes that it is not a struggle between the academy and the bureaucracy, but between parts of society that want change and parts that resist it (p. 140). This fundamental conflict has been exacerbated by unyielding, dominant federal regulatory stance and a shared ignorance and misunderstanding of the roles of each entity. The major shifts in social, economic, and political values of American society that have influenced federal policy have created an opportunity for strategic redefinition of the federal role in eligibility and accreditation. The redefinition of one role in this "triad" will force concurrent adjustments in both the roles and relationships of other members. The confluence of these events has created an opportunity to resolve, by some rational means, long-standing accreditation and eligibility issues. The NPRM process can provide the opportunity and COPA can provide the cooperative forum through which mutually agreeable and complementary roles can be defined.

VIII. CONCLUSIONS

Although constitutional issues have dominated discussions concerning the return of educational control to state governments, there are equally compelling reasons to accomplish deregulation and decentralization tasks that are grounded in the need to facilitate organizational adaptation to change. The convergence of environmental pressures have forced the recognition that many centralized federal structures have malfunctioned, are increasingly being perceived as the source rather than the cure of institutional difficulties, and maintain regulatory tendencies that suppress rather than facilitate institutional adaptation to change.

Organizational structures are social inventions, are shaped by powerful environmental and historical forces, and can be created and recreated to fit changing environmental conditions. The currency and magnitude of those changes impacting postsecondary education can neither be ignored nor accommodated by incremental bureaucratic adjustments. Rather, organizational structures and relationships must be reconstructed in such a manner as to emphasize appropriate and complementary roles imbued with flexibility to address issues whose novelty will no longer be the exception but the rule.

Although the perception of both the magnitude and duration of environmental shifts will remain necessary for organizational leaders to push organizations over the threshold of resistance, they will be increasingly required to move toward an anticipatory, self-excitory

mode to meet the demands for rapid change. An opportunity rather than a crisis has been created that not only can contribute to redefining the roles of federal agencies, state governments, and accrediting agencies, but to distribute restructuring their respective organizations that more effectively reflects their complementary responsibilities.

As a national umbrella organization, COPA is in a unique position to combine both legitimacy and a nonadversarial forum that can contribute to the emergence of mutually satisfactory roles and responsibilities. COPA has assumed a leadership role in restructuring the accreditation community, recognized the increased role of credentials in a more dynamic environment, and has moved to strengthen atrophied state regulatory capabilities with respect to chartering, registering, and licensure mechanisms. These efforts have complemented current federal deregulation and decentralization efforts, supported the role of private voluntary accreditation, and recognized the shared benefits to be derived through a more imaginative definition and restructuring of the accrediting and eligibility process.

In sum, a move toward deregulation and decentralization coupled with a fundamental redefinition and restructuring of the roles, responsibilities, and organizations concerned with accreditation and eligibility is an essential ingredient in facilitating continued organizational adaptation to environmental changes. Within this context, the federal government should take the initiative to shift oversight responsibilities that are necessary to ensure fiscal

stewardship and constitutional guarantees to other appropriate federal agencies, participate in efforts to define complementary roles of members of the "triad," and enhance the capabilities of state governments and regional and national associations in addressing accreditation issues in a dynamic, changing environment. Reconstructing roles and organizational functions must at once recognize the constitutional limitations of the federal government in education, the singular responsibility of the states for control, and the long history and exemplary record of private voluntary accrediting agencies in postsecondary education in supporting educational quality.

REFERENCES

Accountability: Restoring the Partnership. Washington: National Commission on Research, 1978.

Allen, F.L. The Big Change: America Transforms Itself, 1900-1950. New York, Harper and Row, 1952.

Bass, B.M. Stogdill's Handbook of Leadership: A Survey of Theory and Research (revised edition). New York: The Free Press, 1981.

Barnard, C.I. The Functions of the Executive. Cambridge: Harvard University Press, 1938.

Bell, D. The Coming of the Post-Industrial Society: A Venture in Social Forecasting. New York: Basic Books, 1973.

Bender, L.W. "Accreditation: Misuses and Misconceptions," from Young, K.E., C.M. Chambers, H.R. Kells and Associates, Understanding Accreditation. San Francisco: Jossey-Bass Publishers, 1983.

Birnbaum, R. Maintaining Diversity in Higher Education. San Francisco: Jossey-Bass, 1983.

Bjork, L.G. Organizational Environment and the Development of a Research University. Doctoral dissertation, ERIC, 1983.

Blau, P.M. and R.A. Schoenher. The Structure of Organizations. New York: Basic Books, 1971.

Blau, P.M. and R.W. Scott. Formal Organizations: A Comparative Approach. San Francisco: Chandler Publishing, 1962.

Bok, D. The Control of the Campus: A Report on the Governance of Higher Education. Washington: The Carnegie Foundation for the Advancement of Teaching, 1982.

Bowen, H.R. Remarks made on behalf of the Self-Study Advisory Panel made before the Board of the Council on Postsecondary Accreditation, Washington, D.C., October 13, 1981.

Butts, R.F. The College Charts Its Course: Historical Conceptions and Current Proposals. New York: McGraw-Hill, 1939.

Chambers, C.M. "Federal Government and Accreditation," from Young, K.E., C.M. Chambers, H.R. Kells and Associates, Understanding Accreditation. San Francisco: Jossey-Bass Publishers, 1983.

Corson, J.J. The Governance of Colleges and Universities: Modernizing the Structure and the Process. New York, 1975.

Cross, K.P., J.R. Valley and Associates. Planning Non-Traditional Programs: An Analysis of the Issues for Postsecondary Education. San Francisco: Jossey-Bass, 1984.

Drucker, P. "The Coming Changes in Our School Systems," The Wall Street Journal, March 3, 1981, p. 26.

Evans, C. The Micro Millenium. New York: Washington Square Press, 1979.

Finkin, N.W. Federal Reliance on Educational Accreditation: The Scope of Administrative Discretion. Washington: Council on Postsecondary Accreditation, 1978.

Finn, C.E., Jr. "The Future of Education's Liberal Consensus," Change, September 10, 1980.

Finn, C.E., Jr. Scholars, Dollars and Bureaucrats. Washington: The Brookings Institution, 1978.

Furness, W.T. and Gardner, D. (Ed.), Higher Education and the Government. Washington: American Council on Education, 1979.

Ginley, T.J. "Private Accreditation: Responsibilities of Regional Accreditation," from The Federal Government's Relationship to the Nationally Recognized Accrediting Agencies. Washington: Proceedings of an invitational conference sponsored by the Advisory Committee on Accreditation and Institutional Eligibility and Agency Evaluation, U.S. Department of Health, Education and Welfare, Office of Education, 1977.

Handlin, O. and M.F. Handlin. The American College and American Culture: Socialization as a Function of Higher Education. New York: McGraw-Hill Book Company, 1970.

Harcleroad, F.F. "Accreditation: Voluntary Enterprise," from Young, K.E.; Chambers, C.M.; Kells, H.R.; and Associates, Understanding Accreditation. San Francisco: Jossey-Bass Publishers, 1983.

Herbst, P.G. Autonomous Group Functioning. London: Tavistock, 1962.

Hobbs, W. Government Regulation of Higher Education. Cambridge: Ballinger Publishing Company, 1978.

Hofstadter, R. The Age of Reform. New York: Vintage Books, 1955.

Jenks, C., and D. Riesman. The Academic Revolution. New York: Doubleday and Company, 1968.

Kanter, R.M. "Heralding the Renaissance for Corporate America: Relying on the People," Change, July-August 1984, 16, pp. 18-47.

Kaplin, W.K. Respective Roles of Federal Government, State Governments, and Private Accrediting Agencies in the Governance of Postsecondary Education. Washington: Council on Postsecondary Accreditation, July 1975.

Katz, D. and R.L. Kahn. The Social Psychology of Organizations (2nd edition). New York: John Wiley and Sons, 1978.

Keller, G. Academic Strategy. Baltimore: The Johns Hopkins University Press, 1983.

Kimberling, J.R., and R.H. Miles and Associates. The Organizational Life Cycle. San Francisco: Jossey-Bass, 1980.

Kuhn, T.C. The Structure of Scientific Revolutions (2nd edition). Chicago: The University of Chicago Press, 1970.

Lewin, K. "Field Theory in Social Science," Dr. D. Cartwright (ed.), Group Dynamics, Research and Training. New York: Harper and Row, 1961.

Macauley, S. "Non-Contractual Relations in Business: A Preliminary Study," American Sociological Review, February 1963, 28, pp. 55-67.

Manning, T.E. "The Great Probity Debate: Ethical Practices of Institutions and Financial Health," The Control of the Campus: A Report on the Governance of Higher Education. Washington: The Carnegie Foundation for the Advancement of Teaching, 1982.

Meyer, J.W. and B. Rowan. "The Structure of Educational Organization," Dr. M.W. Meyer (ed.), Environments and Organizations. San Francisco: Jossey-Bass, 1978.

Meyer, M.W. (ed.) Environments and Organizations. San Francisco: Jossey-Bass, 1978.

Mortimer, K.P., and M.L. Tierney. The Three "R's" of the Eighties: Reduction, Reallocation and Retrenchment. Washington: American Association for Higher Education, 1979.

Mumford, E. "Social Behavior in Small Groups," Sociological Review, July 1959, 7, pp. 137-157.

Niebuhr, H., Jr. "An Alternative to Decline: A Once-in-a-Century Update of American Higher Education," Change, November/December 1982, 14, pp. 16-21.

Pfeffer, J., and G.R. Salancik. "Organizational Decision Making as a Political Process: The Case of a University Budget," Administrative Science Quarterly, March 1974, 19, pp. 135-151.

Reich, R.B. The Next American Frontier. New York: Time Books, 1983.

Rein, M., and S. White. Problem Setting in Policy Research. Unpublished paper, April 1976.

Rice, A.K. The Enterprise and its Environment. London: Tavistock, 1963.

Seldon, W.K. Accreditation: A Struggle Over Standards in Higher Education. New York: Harper and Row, 1960.

Seldon, W.K., and H.V. Poter. Accreditation: Its Purposes and Uses. Washington: Council on Postsecondary Accreditation, 1977.

Sproull, S., and S. Weiner. "Easier Seen Than Done: The Function of Cognitive Images in Establishing a New Bureaucracy," unpublished paper, 1979.

Stufflebeam, D.L. (et al). Educational Evaluation and Decision Making. Itasca, Illinois: Peacock, 1971.

Terreberry, S. "The Evolution of Organizational Environments," Administrative Science Quarterly, December 1967, 12, pp. 590-613.

Thompson, J.D. Organizations in Action. New York: McGraw-Hill, 1967.

Toffler, A. The Third Wave. New York: William Morrow and Company, Inc., 1980.

Trivett, D.A. Accreditation and Institutional Eligibility. Washington: American Association for Higher Education, 1971.

Tyack, D., and E. Hansot. "Hard Times, Hard Choices: The Case for Coherence in Public School Leadership," Phi Delta Kappan, 1984, 8, pp. 511-515.

Tyack, D., R. Lowe, and E. Hansot. Public Schools in Hard Times: The Great Depression and Recent Years. Cambridge: Harvard University Press, 1984.

Urwick, L.F. Leadership in the Twentieth Century. New York, Pittman Publishers, 1957.

Wilson, J.T. "Higher Education and the Washington Scene," paper presented at the Seminar on Higher Education and the Federal Government, Department of Education, University of Chicago, spring quarter, 1982.

Wilson, W. "School and College," from Proceedings of the Middle States Association of Colleges and Secondary Schools. Philadelphia: Middle States Association of Colleges and Schools, 1907.

Wolotkiewicz, R. College Administrators Handbook. Boston: Allyn and Bacon, Inc., 1980.

Yankelovich, D. New Rules: Searching for Self-Fulfillment in a World Turned Upside Down. New York: Random House, 1981.

Young, K.E., C.M. Chambers, H.R. Kells and Associates. Understanding Accreditation. San Francisco: Jossey-Bass, 1983.